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July 27, 2020

Via ECF

Hon. LaShann DeArcy Hall, U.S.D.J.
U.S. District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Novagold Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK
*First Request On Consent for Extension of Time To Respond To Complaint***

Dear Judge DeArcy Hall:

We are newly retained counsel for Defendant J Capital Research USA LLC (“J Capital”). I write with consent of Plaintiff’s counsel to request an extension of time to answer, move, or otherwise respond to Plaintiff’s Complaint, from July 27, 2020 up to and including **September 10, 2020**.

While we recognize Your Honor normally requires extension requests to be filed two business days in advance of the deadline, we were unaware of the purported service of the Complaint on J Capital until Plaintiff’s filing today (see Dkt. No. 13, filed July 27, 2020). Plaintiff alleges to have served the Complaint on New York’s Secretary of State, which appears to have mailed a copy to J Capital’s office in Brooklyn. However, we understand J Capital’s staff have been out of the office and working remotely under New York’s COVID-19 response measures.

We seek the extension to familiarize ourselves with the J Capital report at issue and Plaintiff’s allegations. Plaintiff’s counsel consents to this request, which is J Capital’s first and which will affect no previously scheduled dates.

I appreciate Your Honor’s consideration.

Respectfully,

/s/David S. Korzenik

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cc: Counsel of Record by ECF